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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

November 7, 1991

Michael A. Izzo
Sussex County Engineering Department
P.O. Box 589
Georgetown, Delaware 19947

Re: Sussex County Landfill No. 5
RI/FS Workplan (Weston, 11/1/91)

Dear Mike:

I have reviewed the November 1, 1991 revised RI/FS Workplan for Sussex County Landfill No. 5 prepared by Roy F. Weston, Inc. on behalf of Sussex County. For the most part, revisions have been made in accordance with EPA comments of October 17, 1991 and the discussion in the teleconference held October 25, 1991 between Sussex County, Weston, DNREC and EPA representatives. There are only a few minor items, discussed below, which need to be revised to finalize the document. In a telephone conversation on November 6, 1991, Tom Drew (Weston) and I decided that the most efficient way to handle the revisions is for me to return the Workplan to Weston, have Weston revise only those few pages which are affected, incorporate the revised pages back into the Workplan, and then return the revised Workplan to me as the final document. This will save Weston from having to reproduce the entire document.

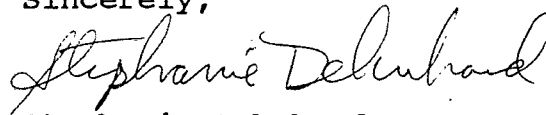
With only minor changes pending, I am conditionally approving the Workplan as submitted. Consequently, your receipt of this letter triggers the 45 day period for preparation of the Sampling and Analysis Plan as specified in the Administrative Order on Consent. The revised Workplan should be submitted by November 22, 1991 or before if available.

Please contact me with any questions at 215-597-3167.

AR300466

Michael A. Izzo
November 7, 1991

Sincerely,

A handwritten signature in cursive script, appearing to read "Stephanie Dehnhard".

Stephanie Dehnhard
Remedial Project Manager
DE/MD Section

attachment

cc: Jamie Hackney, DNREC

AR300467

Michael A. Izzo
November 7, 1991

COMMENTS ON THE RI/FS WORKPLAN DATED NOVEMBER 1, 1991

1. Section 5.2.1, Page 5-2, fourth and last sentences, and Section 5.2.2, Page 5-5, first full sentence - EPA comments from October 17, 1991 stated that the workplan should state clearly that EPA would be involved in the decision making process for determining well placement, well abandonment, etc. Weston revised the document according to those comments; however, EPA's role in the decision making process as stated in the workplan is not as clear as it should be. In order to clarify EPA's role in these decisions, please revise the sentences listed above to read **"EPA consultation and concurrence is required when determining well placement..."**

2. Section 5.2.2, Page 5-3, second paragraph, last sentence - This sentence gives the impression that the only criteria for determining when to abandon temporary monitoring wells is if water quality data indicates no impact. However, there may be other reasons for keeping the wells in place besides monitoring water quality. Please delete the phrase in parentheses to avoid any future misconceptions.

3. Project Schedule - In accordance with EPA's suggestions, the schedule has been shortened by several months from the original version. One further suggestion for reducing the timeline is in the area of evaluating the remedial alternatives and preparing the feasibility study report which has been allotted three months. Acknowledging the fact that this is a critical stage in the project for the County, the County should consider reducing this time period to two months by coordinating closely with Weston to avoid delays in reviewing the alternatives. This schedule, while considerably shorter than the original, is still quite lengthy. Every effort should be made to anticipate what is coming next in the schedule and to plan accordingly to avoid unnecessary delays.

4. For the sake of completeness, Figures 3-1 and 5-1 should be reproduced in color as they did not come out in color in this version of the Workplan. Consequently, it is impossible to determine which wells were installed on which date.

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